UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

CITY OF ALMATY, KAZAKHSTAN and BTA BANK JSC,

Plaintiffs,

15 Civ. 5345 (JGK) (KHP)

-against-

MUKHTAR ABLYAZOV, VIKTOR KHRAPUNOV, ILYAS KHRAPUNOV, and TRIADOU SPV S.A.,

Defendants.

NOTICE OF PLAINTIFFS' MOTION FOR AN ORDER HOLDING ILYAS KHRAPUNOV IN CONTEMPT AND FOR ENTRY OF JUDGMENT FOR THE AMOUNT OF PAST-DUE SANCTIONS

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law and Declaration of Matthew L. Schwartz, Plaintiffs City of Almaty, Kazakhstan and BTA Bank JSC, by and through their attorneys at Boies Schiller Flexner LLP, will move this Court before the Honorable John G. Koeltl, at the U.S. District Court for the Southern District of New York, 500 Pearl St., New York, New York 10007, at such date and time the Court sets, for an order holding Ilyas Khrapunov in contempt and for entry of a judgment for the amount of past-due sanctions.

Dated: January 9, 2023 New York, New York

Respectfully,

/s/ Matthew L. Schwartz

Matthew L. Schwartz

BOIES SCHILLER FLEXNER LLP

55 Hudson Yards

New York, New York 10001

Telephone: (212) 446-2300

Attorneys for Plaintiffs City of Almaty, Kazakhstan and BTA Bank JSC